

## **VII. LEGISLATIVE INQUIRIES**

The Indiana RFP (2.3.1.4.1.h) requires that HCE respond to legislative and executive level (Governor) inquiries within three days (or by a date specified by OMPP) of receipt of the inquiry by the Contractor (**SUC-15**). The following process has been developed to assist in meeting this requirement.

- A. OMPP forwards the actual inquiry and any additional related information as well as a cover letter instructing HCE how the response letter should be prepared via interoffice mail.
- B. The HCE SUR Director coordinates assignment, monitors progress, and ensures a timely response. The Program Integrity Specialists maintain a spreadsheet tracking the receipt and timeliness of all inquiries and suggested responses.
- C. A Program Integrity staff member completes a review of the inquiry, drafts an appropriate response, and forwards the document through the HCE document integrity process. Once a suggested response has passed all integrity checkpoints, an HCE specific tracking number is requested and attached to the suggested response.
- D. The Legislative/Executive Style Writing Guide, prepared for EDS in 1998, is the official OMPP writing tool referenced when forming suggested responses to all legislative inquiries.
- E. The response and cover letters are forwarded via e-mail to the OMPP contact within the appropriate time frame.
- F. If additional time is required to complete a review and form a suggested response to a legislative inquiry, an extension is requested from the OMPP contact either verbally or via electronic mail.

## **VIII. REPORTING**

To facilitate oversight of the SUR business function, a variety of reports are compiled to summarize SUR activities and highlight significant accomplishments and pending projects. These reports are shared with other functional areas of the IHCP such as MP, PA, and other contracted entities to keep those areas abreast of the latest significant utilization concerns and potential fraudulent or abusive practices affecting the IHCP. SUR also supports the IHCP by providing ad hoc reports and queries as requested by the State. The following is a list of standard reports compiled by SUR on a regular basis.

- A. An updated listing of all scheduled providers audits, both on-site and off-site, will be provided to the State on a monthly basis. This listing will identify the type of provider being audited, provider name and Medicaid number, location (city) where the audit will be conducted, and names of the SUR reviewers who are scheduled to conduct the audit.
- B. SUR Quarterly Report – within 30 days of the end of each calendar quarter, SUR provides a review of the accomplishments of the most recent three month period. The report covers all functional areas of SUR including acute care and non-hospital provider audits, prepayment review, recoupment of overpayments, the Restricted Card Program, and fraud and abuse initiatives.
- C. Monthly Reports – SUR provides a number of operational reports on a monthly basis to OMPP. These reports include a summary of overpayments collected and identified, provider hearings and appeals activity, and a summary of upcoming SUR provider audits.
- D. New Provider Analysis is conducted via the following methods.
  - Monthly review by Program Integrity staff of all newly enrolled providers in designated program areas; and
  - An algorithm that analyzes new providers for early aberrant behavior.
- E. Other reports are provided as requested and may become standard weekly, monthly, or quarterly reports based on the need of OMPP for the requested information.

## **IX. COORDINATION**

To promote optimum efficiency and effectiveness of the SUR activities, SUR staff participate in numerous coordination activities. The following paragraphs outline the basic internal and external coordination activities that occur on a normal basis in the operation of the SUR business function.

### **A. Internal Coordination**

The SUR department coordinates extensively with other HCE business functions including MP and PA in carrying out the operations of the contract. Inquiries are sent to the MP department when policy research or clarification is required. The responses received are utilized to support SUR audit findings, to respond to provider questions, and to support future educational activities. SUR also identifies areas for potential policy clarification based on audit activities. These issues are forwarded to MP to consider for incorporation in pending review projects.

SUR receives referrals from the PA department to identify providers potentially circumventing or attempting to manipulate the prior authorization process. PA works with SUR to ensure approvals or decisions rendered are consistent with the application of guidelines retrospectively by SUR.

As the result of a SUR contract expansion effective 3/1/05, SUR is developing a Claims Analysis and Recovery (CAR) unit. CAR will systematically identify overpayments for recovery. CAR, SUR, and PI staff will coordinate to prevent duplication of efforts. The addition of the CAR unit allows a more centralized effort to enhance program integrity and promote program safeguards.

### **B. External Coordination**

The core external coordination activities that occur on a regular basis are listed below. SUR staff may participate in additional external coordination activities as business needs are identified or at the discretion of OMPP.

1. Office of Medicaid Policy and Planning (OMPP) – SUR works with OMPP staff as needed in interpreting the needs of the SUR business function to support the IHCP and in reporting to meet contract requirements. OMPP may be extensively involved in the day-to-day operations of SUR.

Indiana Medicaid Fraud Control Unit (MFCU) – In accordance with the Memorandum of Understanding between the OMPP and MFCU, SUR reviews all case recommendations with MFCU prior to initiating audit activities. This coordination process protects any potential cases that the MFCU or the Office of the Attorney General may be investigating or developing. The MFCU responds to SUR requests for case review within 10 business days with direction to proceed with recommendations, to hold activities, or to contact a staff member for case

specific coordination. Program Integrity implemented a referral process to help facilitate more comprehensive SUR referrals to the MFCU. The process encompasses all aspects of the case known to SUR for cases recommended for further investigation by the MFCU. Quarterly, a comprehensive list of cases on hold is forwarded to MFCU for review to facilitate release of aged cases that may have been resolved.

2. Payment Integrity Program (PIP) – SUR works with the PIP contractor, Myers and Stauffer, to provide the most comprehensive retrospective review of all aspects of IHCP utilization. While SUR pursues cases that require review of medical records to determine appropriateness of utilization, PIP will typically review issues that can be viewed from a system perspective, without review of medical records. Coordination efforts are concentrated on ensuring that both contractors are not addressing the same issues.
3. Electronic Data Systems (EDS) – Perhaps the most frequent coordination link is that which occurs almost daily between SUR and EDS. SUR works on a one-on-one basis with numerous systems, provider relations, financial, claims and other EDS staff to resolve specific issues as they are identified in the business operations. SUR attends numerous meetings to promote consistency and communication between the contractors. A sample of those meeting includes Reference File, Client Services, and special meetings for projects such as HIPAA.

As a result of providers attempting to circumvent prepayment review by re-enrolling under a new provider name and number, Program Integrity implemented a new process. Program Integrity coordinates with EDS to obtain newly enrolled provider enrollment verification provider listings for designated program areas on a monthly basis. This process allows Program Integrity to monitor shifts in utilization by these providers.

4. Audit Contractor Coordination Meeting – On a monthly basis, SUR coordinates a meeting between OMPP, MFCU, and PIP to discuss audit issues of common interest, to review upcoming audit activities, and to share knowledge of state or national issues related to fraud and abuse. This meeting facilitates communication between these retrospective review entities, ensuring comprehensive review of IHCP utilization.
5. Managers Issue Meeting – On a bi-weekly basis, OMPP staff meet with HCE, and EDS managers meet to discuss complicated issues that require coordination between contractors. This meeting was created to more effectively discuss high-level issues previously addressed in the Audit Systems meeting (dissolved).
6. Northern Indiana Health Care Fraud Task Force – SUR participates in the Northern Indiana Health Care Fraud Task Force quarterly meetings focusing on health care fraud in the northern district of Indiana. Participants include the United States Attorney's Office Northern Indiana district; OIG; FBI; IRS; CMS Program Safeguard Contractors (PSCs), and IMFCU.

7. CMS Region V Border States Conference Call – SUR participates in the CMS Region V Border State Conference Call where information about providers under scrutiny is shared between SUR units within Region V.
8. National Association of Surveillance Officials (NASO) – In an effort to stay abreast of the latest developments in the field of fraud and abuse detection, the SUR Director and staff maintain a high level of involvement in the NASO network. This participation allows interaction in a nationwide e-mail user group sharing latest trends and best practices available for SUR audits. In addition, a national meeting each year allows HCE SUR to learn of the latest technology, case studies, and detection methods available to combat fraud and abuse. Coordination amongst the state SUR units allows for stronger detection and identification of aberrant practices.
9. National Association of Drug Diversion Investigators (NADDI) – A Program Integrity designee is a member of NADDI, an organization composed of law enforcement and regulatory agencies for the purposes of employing high level skills to detect drug diversion. The Program Integrity designee attends quarterly meetings to network coordinate with these agencies which employ opportunities for potential SUR case referrals.